

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

**FILED**

**SEP 28 2001**

PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.

IN RE:

INTERNATIONAL HERITAGE, INC.

Debtor.

CASE NO. 98-02675-5-ATS  
CHAPTER 7

SECOND INTERIM APPLICATION FOR ALLOWANCE OF MERRITT, WOOTEN  
& JANVIER, P. A. SPECIAL COUNSEL ATTORNEY FOR TRUSTEE  
FEES AND EXPENSE REIMBURSEMENT

The undersigned trustee in the above chapter 7 case respectfully petitions the court for allowance of special counsel attorney for Trustee for allowance of fees in the amount of \$364.50 and reimbursement of expenses in the amount of \$.93. In support of said Application the trustee respectfully shows the Court the following:

1. Applicant was retained as special counsel to the Trustee in this case.
2. Applicant has rendered valuable services as such in the administration of this estate. The services rendered by special counsel are broadly described as follows:

Investigated bank accounts of debtor.

3. The services rendered are more particularly described on the attached invoice as Exhibit A. Special counsel has removed all time reflecting "secretarial type services", has removed all time reflecting travel time, and has billed in tenth of an hour increments. Applicant has not billed for any telephone calls lasting under five minutes, except to the extent that such calls resulted in the need for other action to be taken which was taken immediately following the call.
4. Special counsel has incurred expenses in his representation of the Trustee in the amount of \$.93 as set out on the attached Exhibit A. Copy expenses are charged at the rate of 15 cents per copy. Facsimile transmissions are charged only if long distance.
5. William P. Janvier has rendered services as follows 2.70 hours at the rate of \$135.00 per hour.

Copy ret'd 9/28/01 Am

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6. William P. Janvier is a Board Certified Specialist in Business and Consumer Bankruptcy Law, and a member to the Panel of Chapter 7 Trustees in this district. He graduated with honors from the University of North Carolina School of Law in 1992, where he served as Editor-in-Chief of the North Carolina Journal of International Law & Commercial Regulation. While Mr. Janvier regularly represents debtors and creditors before this Court, a larger part of his practice involves the representation of Chapter 7 Trustees before this Court. Bankruptcy representation constitutes the majority of his practice. William P. Janvier is a principal in the firm of Merritt, Wooten & Janvier, P. A.
7. The best interests of justice and fairness are served by the allowance of the Application in the full amount of fees and expense reimbursement requested.

WHEREFORE, Trustee respectfully requests the Court for the entry of an Order allowing and approving Special Counsel for Trustee fees in the amount of \$364.50 and expense reimbursement in the amount of \$.93.

Respectfully submitted, this the 25<sup>th</sup> day of Sept, 2001.



Holmes P. Harden, Trustee  
NC State Bar No. 9835  
P. O. Drawer 19764  
Raleigh, NC 27619  
Telephone: (919) 981-4000

# MERRITT & ASSOCIATES, P.A.

Attorneys at Law

Telephone 919-834-9160

P. O. Box 3007  
Raleigh, NC 27602-3007

Tax ID #56-1764890

Harden, Holmes, Trustee  
P. O. Box 19764  
Raleigh, NC 27619-9764

Page: 1  
10/31/00  
Billing # 458-14M  
Statement No: 2

International Heritage, Inc.

Previous Balance

\$7,080.55

	Rate	Hours	
09/23/99			
WPJ Call from Brent Woods' office to set up meeting (.1).	135.00	0.10	13.50
10/01/99			
WPJ Prepare for and meet with Brent Wood re: potential actions listed on Exhibit B20 to schedules (1.6); review file at Clerk of Court re: deposit for TRO (.2).	135.00	1.80	243.00
10/29/99			
WPJ Review fax from German bank and respond (.5).	135.00	0.50	67.50
11/10/99			
WPJ Calls from and to Kathryn Koence (.1).	135.00	0.10	13.50
11/11/99			
WPJ Calls from and to Kathryn Koence re: priority class order settlement.	135.00	0.20	27.00
For Current Services Rendered		2.70	364.50

## Recapitulation

Timekeeper  
William P. Janvier

<u>Hours</u>	<u>Total</u>
2.70	\$364.50

09/15/00 Postage Expense  
09/15/00 Photocopy Expense

0.33  
0.60

Total Expenses

0.93

International Heritage, Inc.

Total Current Charges 365.43

11/01/99 Thank you for the payment received in Check 1002 -7,080.55

Balance Due \$365.43

PAYMENT TERMS: NET 30 DAYS. 1.5% PER MONTH CHARGED ON  
AMOUNTS OVER 30 DAYS.